

Application No. 09/392,106

### REMARKS

Claims 1-30 remain pending in the application, with claims 1, 15, 23 and 24 being the independent claims. Reconsideration and further examination are respectfully requested.

Applicants thank the Examiner for the telephonic interview conducted on February 17, 2005, with Applicants' attorney. After discussing certain distinctions between the present invention and the applied art, the Examiner indicated that he would like to discuss the present case with other examiners and, based on such discussions, would reconsider whether the case is allowable.

The present case is related to Application Serial No. 09/392,109. That application issued as U.S. Patent 6,792,399 on September 14, 2004.

The pending claims have been amended above to change the term "predictor variable" to "baseline variable". This change was solely to make the claims more readable. It was motivated by a comment previously made by the Examiner to the effect that the claims' various uses of the term "predict" (and derivatives thereof) made the claims difficult to understand. No change in the scope of the claims was intended as a result of these amendments, nor is any believed to have been effected.

As discussed during the telephonic interview, each of independent claims 1, 23 and 24 recites, among other features, the features of: (i) generating a forecasting model by fitting a first set of predicted values for plural baseline variables to historically realized values for a target variable; and (ii) generating a predicted value for the target variable from a second set of predicted values for at least a subset of the plural baseline variables using that forecasting model.

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In other words, both the generation of the model and the prediction of the target variable are based on predicted values for certain baseline variables. Because the technique uses predictions for the baseline variables, which are different than the target variable, the prediction of the target variable can be roughly described as a form of "prediction interpolation". Such a technique is not disclosed or suggested by the applied art.

In this regard, U.S. Patent 6,088,676 (White) describes systems and methods for testing prediction models, and does not itself appear to discuss how to generate any predictions in the manner presently recited. U.S. Patent 6,532,449 (Goertzel) only appears to discuss making predictions based upon non-numerical historical data, such as newspaper articles. See, e.g., column 1 line 51 to column 2 line 10 of Goertzel. U.S. Patent 6,032,125 (Ando) discusses a forecasting model for forecasting demand based on historical sales data. See, e.g., Ando's Abstract. Thus, none of the applied art references, whether singly or in combination, discusses or suggests predicting the value of a target variable in the manner presently claimed.

For these reasons, independent claims 1, 23 and 24 are believed to be allowable over the applied art.

Independent claim 15 recites, among other features, the features of: (i) identifying a subset of plural baseline variables whose first set of predicted values provide a best fit to historically realized values for a target variable; and (ii) generating a predicted value for the target variable from a second set of predicted values for the identified subset of the plural baseline variables.

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The technique recited in independent claim 15 also uses predicted values for the baseline variables, albeit in a somewhat different manner than in the independent claims discussed above. However, similar to those claims, claim 15 also uses predictions for baseline variables to predict the value of a target variable. Thus, for reasons similar to those set forth above, the applied art would not have disclosed or suggested either of the foregoing features of independent claim 15.

Accordingly, independent claim 15 also is believed to be allowable over the applied art.

In order to sufficiently distinguish Applicants' invention from the applied art, the foregoing remarks emphasize several of the differences between the applied art and Applicants' invention. However, no attempt has been made to categorize each unobvious difference. Applicants' invention comprises all of the elements and all of the interrelationships between those elements recited in the claims. It is believed that for each claim the combination of such elements and interrelationships is not disclosed, taught or suggested by the applied art. It is therefore believed that all claims in the application are fully in condition for allowance, and an indication to that effect is respectfully requested.

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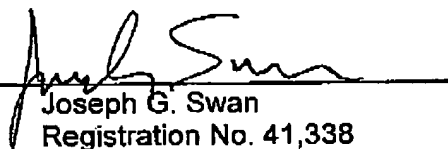
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Respectfully submitted,

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